

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In re:
QUENTIN M. MOSBY and
QUIANA S. MOSBY,
Debtors.

Chapter 13
Case No. 23-20795-KMP

**TRUSTEE’S NOTICE OF MOTION AND MOTION TO (1) REQUIRE DEBTORS TO
PRODUCE INFORMATION UNDER RULE 2004 AND (2) EXTEND THE
TRUSTEE’S DEADLINE TO OBJECT TO CONFIRMATION**

NOTICE

The Trustee, Scott Lieske, has filed the accompanying Motion that requests (1) an order requiring the Debtors to produce documents, materials, or information, pursuant to Fed. R. Bankr. P. 2004, relating to the Debtors' financial circumstances or chapter 13 plan, and (2) an extension of the deadline for the Trustee to object to confirmation of the plan in order to afford the Trustee time to consider the Debtors' production in response to the order (the “Motion”). If the Debtors oppose the Motion, the Debtors must file an objection by no later than **14 days** after the date on which the Trustee filed the Motion. The court may grant the Motion before this objection period expires; if the court does so, it will consider any timely filed objection as a request to reconsider anew its granting of the Motion. Any objection must state supporting specific facts and legal citations and may be accompanied by supporting declarations.

MOTION

After examining the Debtors at the meeting of creditors and reviewing the Debtors' filings in this case, the Trustee contends that additional information is necessary to determine whether the Trustee should recommend or oppose confirmation of the plan or seek dismissal of this case.

WHEREFORE, pursuant to Federal Rule of Bankruptcy Procedure 2004, the Trustee requests that the Court order the following:

- A. Require the Debtors to produce the following documents to the Trustee on or before May 25, 2023:
 - 1. Paystubs for the Debtor-husband's new job to which the Debtor-husband testified at the Meeting of Creditors
- B. Extend the deadline for the Trustee to object to confirmation of the Debtors' chapter 13 plan to June 22, 2023.

OFFICE OF CHAPTER 13 TRUSTEE

/s/



Christopher D.
Schimke
2023-04-03 12:11:55

Scott Lieske, Chapter 13 Trustee
Christopher D. Schimke, Staff Attorney
Kyle R. Knutson, Staff Attorney
Judith L. Du Sell, Staff Attorney